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BNSF RAILWAY COMPANY

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

JACKSON WELLS, as Personal Representative for the Estate of THOMAS E. WELLS, deceased; and JUDITH HEMPHILL, as Personal Representative for the Estate of JOYCE H. WALDER, deceased,

Plaintiffs,

vs.

BNSF RAILWAY COMPANY, a Delaware corporation; and DOES A-Z,

Defendants.

Case No.: 4:21-cv-00097-BMM

**DEFENDANT BNSF
RAILWAY COMPANY'S
MOTION FOR
CONTINUANCE AND
CHANGE OF VENUE**

COMES NOW, Defendant BNSF Railway Company (“BNSF”), by and through its counsel of record, Knight Nicastro MacKay, LLC, and hereby submits its Motion for Continuance and Change of Venue:

MOTION

BNSF respectfully requests that the Court grant this Motion to continue the trial and transfer it to a venue outside of the State of Montana.

In support of this Motion, Defendant submits its accompanying brief in support.

Dated this 7th day of April, 2024.

KNIGHT NICASTRO MACKAY, LLC

By: /s/ Anthony M. Nicastro

Chad M. Knight

Anthony M. Nicastro

Cole R. Anderson

Attorneys for Defendant

BNSF Railway Company

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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